

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN Re:

Lance Patrick Alexander and,
Terri Ann Alexander
Debtors,

Case No. 17-21820-JAD

Chapter 13

Lance Patrick Alexander and,
Terri Ann Alexander,
Movants,

Related to DD No. 184, 185
Docket Document No. 186

vs.

Ronda J. Winnecour Chapter 13
Trustee,

Respondent,

STATUS REPORT RE: CERTIFICATE OF DEFAULT

AND NOW the Debtors Lance and Terri Alexander, through attorney David A. Coleechia, Esq., file the within Status Report concerning the Trustee's Certification of Default.

- 1) This Status Report relates to the Trustee's Certificate of Default filed at DD No. 184.
- 2) After discussion between Debtors and Counsel, the Debtors have determined that they are unable to file an Amended Plan or proposed Notice to Cure Plan Default.
- 3) The Debtors also cannot dispute the Plan is in default.
- 4) Instead, the Debtors will be filing a Motion for a Hardship Discharge later today.
- 5) However, since such a Motion is not one of the designated responses available for a default, the Debtors believed it prudent to file the within Status Report to alert the Court as to the current circumstances and inability to respond absent a Motion for Hardship Discharge, and to indicate the Debtors are not willfully ignoring this Court's Orders.

6) Counsel for the Debtor intends to file, self-schedule, and serve the Motion for Hardship Discharge later today.

WHEREFORE, the Debtors so Report.

Dated: May 11, 2023

By: /s/ David A. Colecchia
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